

WINSTON & STRAWN LLP
 David Neier (DN-5391)
 200 Park Avenue
 New York, New York 10166
 (212) 294-6700
 (212) 294-4700 (facsimile)
 dneier@winston.com

Attorneys for Piper Jaffray & Co.

Hearing: January 14, 2009, 10:00 a.m. ET
Objection: January 9, 2009, 4:00 p.m. ET

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	
	:	Chapter 11
LEHMAN BROTHERS HOLDINGS, INC.,	:	
<i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	
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**NOTICE OF MOTION OF PIPER JAFFRAY & CO.
 FOR LEAVE TO CONDUCT DISCOVERY PURSUANT TO
 FED. R. BANKR. P. 2004 OF DEBTOR LEHMAN COMMERCIAL PAPER INC.**

PLEASE TAKE NOTICE that Piper Jaffray & Co. ("Piper"), by and through their undersigned counsel, have filed a motion for leave to conduct discovery of Debtor Lehman Commercial Paper Inc. and other entities, pursuant to 11 U.S.C. § 105(a) and Federal Rule of Bankruptcy Procedure 2004 (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion, as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York,

New York, 1004 (the “Bankruptcy Court”), on **January 14, 2009 at 10:00 a.m. (Eastern Time)** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall (a) be made in writing; (b) conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York; (c) set forth the name of the objecting party, the basis for the objection and the specific grounds thereof; (d) be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (as amended) (i) electronically by registered users of the Bankruptcy Court’s case filing system, or (ii) on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format, by all other parties in interest; (e) be submitted in hard copy form to the Chambers of the Honorable James M. Peck, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, Courtroom 601; and (e) be served upon the following parties: (i) counsel for Piper, Winston & Strawn LLP, 200 Park Avenue, New York, New York 10166, Attn: David Neier, Esq.; (ii) counsel for Debtors, Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq. And Jacqueline Marcus, Esq.; (iii) the Office of the United States Trustee for the Southern District of New York (the “U.S. Trustee”), 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq. and Tracy Hope Davis, Esq.; (iv) counsel for the Official Committee of Unsecured Creditors, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq. and Evan Fleck, Esq.; (v) counsel for the Debtors’ Postpetition Lenders,

Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006, Attn: Lindsee P. Granfield, Esq. and Lisa Schweiger, Esq., and Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Robinson B. Lacy, Esq. and Hydee R. Feldstein, Esq., (vi) the attorneys for any other official committee(s) appointed in these chapter 11 cases; and (vii) any person or entity with a particularized interest in the Motion, so as to be received no later than **January 9, 2009, at 4:00 p.m. (Eastern Time)** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: December 18, 2008
New York, New York

WINSTON & STRAWN LLP

By: /s/David Neier
David Neier (DN-5391)
200 Park Avenue
New York, New York 10166
Telephone No.: (212) 294-6700
Facsimile No.: (212) 294-4700
denier@winston.com

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